

Marc Wolstenholme
5 Shetland Close
Coventry, England CV5 7LS
Telephone: 044 7827964404
Email: marc@mwwolf-fiction.co.uk
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

NOTICE REGARDING DEFENDANT'S
LITIGATION CONDUCT AND WIDER
PUBLIC SAFETY CONCERNS

Dated this: April 17, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

1 NOTICE REGARDING DEFENDANT’S LITIGATION CONDUCT AND
2 WIDER PUBLIC SAFETY CONCERNS
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5 Plaintiff Marc Wolstenholme, appearing pro se, respectfully files this Notice to
6 place on the record continuing and serious concerns regarding Defendant Riot Games, Inc.'s
7 litigation conduct. This includes systemic bad faith litigation behavior, refusal to engage in
8 discovery, noncompliance to engage in court ordered settlement discussions, lies, threats,
9 financial intimidation, manipulation, abuse of vulnerable individuals, and conduct with
10 potentially serious implications for public safety and national interests.
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13 **I. Summary of Concerns**

14 Throughout the litigation, Riot Games has demonstrated a consistent pattern of
15 procedural abuse, obstruction, and retaliatory conduct. Their legal strategy has involved
16 manipulative settlement offers, refusal to meaningfully respond to Plaintiff’s Second Amended
17 Complaint (SAC), failure to produce discovery, failure to engage in good faith settlement orders,
18 and repeated efforts to delay or derail proceedings.
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20 This conduct not only imposes extreme burdens on the Plaintiff, a disabled pro se
21 litigant, but mirrors broader systemic concerns surrounding Riot’s culture and practices, as
22 further outlined in Plaintiff’s prior motion.
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II. Incorporation of Exhibit 88

Plaintiff hereby incorporates by reference Dkt. 88, PLAINTIFF'S MOTION OF CONCERN REGARDING DEFENDANT'S LITIGATION BEHAVIOR AND CONDUCT AND WIDER GLOBAL CONCERNS, as Exhibit A to this Notice. This serves as a reference, not a motion herein. Dkt 88 is reformed into Exhibits to outline, in detail, Plaintiff's grave concerns regarding:

- The targeting of vulnerable individuals.
- Documented patterns of IP theft and narrative manipulation.
- Discriminatory and abusive work environments.
- Potential links to broader geopolitical risks and radicalization concerns.

These allegations are not only supported by Defendant's litigation behavior but align with documented public controversies and prior investigations into Riot Games' conduct by regulatory bodies such as the California Civil Rights Department.

III. Request for Judicial Acknowledgment and Oversight

Plaintiff respectfully requests that the Court:

- Take judicial notice of the attached Exhibits (Dkt. 88).
- Recognize the broader pattern of litigation abuse and cultural concerns presented.
- Consider whether oversight, sanctions, or procedural safeguards are necessary to protect the integrity of the Court and the rights of the parties.

**EXHIBIT A – PLAINTIFF’S STATEMENT REGARDING DEFENDANT’S
LITIGATION BEHAVIOR AND SYSTEMIC CONCERNS**

This Statement is submitted to assist the Court in understanding Plaintiff’s experience with the conduct of Defendant Riot Games, Inc. throughout this litigation. It is not a motion or request for relief, but rather a record of Plaintiff’s observations and concerns based on Riot’s conduct to date, and the broader implications that arise.

Defendant has engaged in a sustained pattern of delay, procedural avoidance, and refusal to meaningfully engage with Plaintiff’s claims. These behaviors include failure to respond substantively to the Second Amended Complaint, blanket objections to discovery, evasive responses to Requests for Admission, lies, financial intimidation, threats, mocking, compliance and endorsement of toxic, dangerous and radical behavior via ignorance (bomb threats, child porn, discrimination, racism, sexism, doxing, gaslighting, taunting and mocking) and manipulative behavior during court-ordered settlement proceedings. The overall strategy appears designed to overwhelm, delay, and discredit a vulnerable pro se litigant rather than address the claims on their merits.

Riot’s behavior mirrors prior documented patterns from public reports and regulatory investigations, including the \$100 million settlement with the California Civil Rights Department, and suggests a culture of deflection and abuse of process. The Plaintiff raises these concerns in good faith and requests that they be preserved in the Court’s record to contextualize further developments.

Examples of this conduct include:

- Lying and Threatening dismissal at early stages, before substantive motions were reviewed.

- Refusing to meet and confer until procedural deadlines passed.

- Using court procedural tools as leverage to exhaust the Plaintiff.

- Proposing a protective order only after refusing to produce any discovery.

- Failing to engage with multiple pre-litigation and court-ordered settlement efforts.

Plaintiff affirms that this Statement is made in good faith and submitted to provide transparency, maintain a clear litigation record, and assist the Court in protecting the fair administration of justice.

Please see the following Statement of more in-depth evidence and concerns, submitted as Exhibit A for the Court's reference.

This Statement is not a motion, but a factual summary of the Plaintiff's experiences, observations, and supporting evidence regarding the conduct of Defendant Riot Games, Inc., originally filed as a part Dkt. 88 and now reformatted for procedural compliance.

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 17, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

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Coventry, England CV5 7LS

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